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REAL ESTATE COMMISSION
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**BEFORE THE REAL ESTATE COMMISSION
STATE OF NEVADA**

GAIL J. ANDERSON, Administrator,
REAL ESTATE DIVISION, DEPARTMENT
OF BUSINESS & INDUSTRY,
STATE OF NEVADA,

Case No. REN 10-03-01-050

Petitioner,

vs.

COMPLAINT AND NOTICE OF HEARING

KAREN GREATHOUSE,

Respondent.

The REAL ESTATE DIVISION OF THE DEPARTMENT OF BUSINESS AND INDUSTRY OF THE STATE OF NEVADA ("DIVISION"), by and through its counsel, Catherine Cortez Masto, Attorney General of the State of Nevada, and Kimberly A. Arguello, Senior Deputy Attorney General, hereby notifies RESPONDENT KAREN GREATHOUSE ("RESPONDENT") of an administrative hearing before the STATE OF NEVADA REAL ESTATE COMMISSION ("COMMISSION") which hearing will be held pursuant to Chapters 233B and Chapter 645 of the Nevada Revised Statutes ("NRS") and Chapter 645 of the Nevada Administrative Code ("NAC"). The purpose of the hearing is to consider the allegations stated below and to determine if the RESPONDENT should be subject to an administrative penalty as set forth in NRS 645.633 and/or NRS 645.630 and/or NRS 622.400, and the discipline to be imposed, if violations of law are proven.

JURISDICTION

RESPONDENT KAREN GREATHOUSE was at all relevant times mentioned in this Complaint licensed as a salesperson by the Division under license number S.0058818, and is therefore subject to the jurisdiction of the Division and the provisions of NRS chapter 645 and NAC chapter 645.

FACTUAL ALLEGATIONS

1. RESPONDENT, at the relevant times mentioned in this Complaint, was licensed as a salesperson, license number S.0058818 from December 8, 2003 through December 31,

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Las Vegas, NV 89101

1 2012, and is licensed as a real estate broker, license number B.1000788.CORP since March
2 17, 2011, and as a property manager, license number PM.0165003.BKR since August 5,
3 2011, and is currently in active status and subject to the jurisdiction of the Division and the
4 provisions of NRS chapter 645 and NAC chapter 645.

5 2. On or about August 13, 2009, the owner engaged RESPONDENT to list and sell
6 a house located at 2550 Lakeridge Shores East, Reno, Nevada (the "Property").

7 3. On or about August 16, 2009, RESPONDENT entered the Property on the
8 Northern Nevada Regional Multiple Listing Service ("MLS") with a price of \$371,000.

9 4. Shortly thereafter, on or about August 18, 2009, 7 Figures, LLC bought the
10 Property for \$371,250.

11 5. RESPONDENT represented 7 Figures, LLC in the buying of the Property.

12 6. 7 Figures, LLC was owned by Tracy Lenocker.

13 7. Lenocker was also the president and owner of Leadsorce Marketing Company.

14 8. The address for 7 Figures, LLC was the same as Leadsorce Marketing
15 Company.

16 9. David Provenzano was the registered agent for Leadsorce Marketing
17 Company.

18 10. On or about February 10, 2010, on behalf of 7 Figures, LLC, RESPONDENT
19 listed the Property on the MLS for \$699,000.

20 11. Based upon information and belief, RESPONDENT, at the relevant times
21 mentioned in this Complaint, was in a personal relationship with David Provenzano, which
22 included co-habitation.

23 12. Based upon information and belief, RESPONDENT did not disclose her
24 affiliation with Provenzano to the seller, Bank of America.

25 VIOLATIONS

26 RESPONDENT has committed the following violations of law:

27 13. RESPONDENT violated NRS 645.633(1)(i) by engaging in deceitful, fraudulent
28 or dishonest dealing with respect to her actions regarding the Property.

DISCIPLINE AUTHORIZED

14. Pursuant to NRS 645.630 and NRS 645.633, the Commission is empowered to impose an administrative fine of up to \$10,000 per violation against RESPONDENT and further to suspend, revoke or place conditions on the license of RESPONDENT.

15. Additionally, under NRS Chapter 622, the Commission is authorized to impose costs of the proceeding upon RESPONDENT, including investigative costs and attorney's fees, if the Commission otherwise imposes discipline on RESPONDENT.

16. Therefore, the Division requests that the Commission take such disciplinary action as it deems appropriate under the circumstances.

NOTICE OF HEARING

PLEASE TAKE NOTICE that a disciplinary hearing has been set to consider the Administrative Complaint against the above-named Respondent in accordance with Chapters 233B and 645 of the Nevada Revised Statutes and Chapter 645 of the Nevada Administrative Code.

THE HEARING WILL TAKE PLACE on June 24, 2014 commencing at 8:30 a.m., or as soon thereafter as the Commission is able to hear the matter, and each day thereafter commencing at 8:30 a.m. through June 26, 2014, or earlier if the business of the Commission is concluded. The Commission meeting will be held at the Legislative Building, 401 South Carson Street, Room 3137, Carson City, Nevada 89701. The meeting will continue on June 25, 2014 at the Legislative Building, 401 South Carson Street, Room 3137, Carson City, Nevada 89701, commencing at 8:30 a.m., and on June 26, 2014, starting at 8:30 a.m. at the Legislative Building, 401 South Carson Street, Room 3137, Carson City, Nevada 89701.

STACKED CALENDAR: Your hearing is one of several hearings scheduled at the same time as part of a regular meeting of the Commission that is expected to last from June 24 through June 26, 2014, or earlier if the business of the Commission is concluded. Thus, your hearing may be continued until later in the day or from day to day. It is your responsibility to be present when your case is called. If you are not

1 present when your hearing is called, a default may be entered against you and the
2 Commission may decide the case as if all allegations in the complaint were true. If you
3 have any questions please call Rebecca Hardin, Commission Coordinator (702) 486-
4 4074.

5 YOUR RIGHTS AT THE HEARING: except as mentioned below, the hearing is an
6 open meeting under Nevada's open meeting law, and may be attended by the public. After
7 the evidence and arguments, the commission may conduct a closed meeting to discuss your
8 alleged misconduct or professional competence. A verbatim record will be made by a certified
9 court reporter. You are entitled to a copy of the transcript of the open and closed portions of
10 the meeting, although you must pay for the transcription.

11 As the Respondent, you are specifically informed that you have the right to appear and
12 be heard in your defense, either personally or through your counsel of choice. At the hearing,
13 the Division has the burden of proving the allegations in the complaint and will call witnesses
14 and present evidence against you. You have the right to respond and to present relevant
15 evidence and argument on all issues involved. You have the right to call and examine
16 witnesses, introduce exhibits, and cross-examine opposing witnesses on any matter relevant
17 to the issues involved.

18 You have the right to request that the Commission issue subpoenas to compel
19 witnesses to testify and/or evidence to be offered on your behalf. In making the request, you
20 may be required to demonstrate the relevance of the witness' testimony and/or evidence.
21 Other important rights you have are listed in NRS 645.680 through 645.990, NRS Chapter
22 233B, and NAC 645.810 through 645.875.

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1 The purpose of the hearing is to determine if the Respondent has violated NRS 645
2 and/or NAC 645 and if the allegations contained herein are substantially proven by the
3 evidence presented and to further determine what administrative penalty, if any, is to be
4 assessed against the Respondent pursuant to NRS 645.235, 645.633 and or 645.630.

5 DATED this 23rd day of May, 2014.

6 State of Nevada
7 Department of Business and Industry
8 Real Estate Division

9 By: 

10 Gail J. Anderson, Administrator
11 2501 East Sahara Avenue
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14 CATHERINE CORTEZ MASTO
15 Attorney General

16 By: 

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